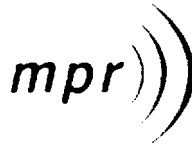


MINNESOTA PUBLIC RADIO



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April 24, 1998

APR 27 1998

FCC MAIL ROOM

Magalie Roman Salas, Secretary  
Federal Communications Commission  
Room 222  
1919 M Street NW  
Washington, DC 20554

Dear Ms Salas;

Please accept for informal filing the enclosed Comments on the RM - 9208 (a Petition for Microstation Radio Broadcasting Service), RM 9242 (a Proposal for Creation of the Low Power FM Broadcast Service) and RM - 9246 (a Petition to Establish Event Broadcast Stations).

Respectfully Submitted

Mitzi T Gramling  
Associate General Counsel

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Before The  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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APR 27 1998  
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In the matter of:

Request to amend the AM and FM service rules  
to designate one AM and one FM channel for a  
microbroadcast service.

RM - 9208

Proposal for Creation of the Low Power (LPFM)  
Broadcast Service

RM - 9242

Proposal for Event Broadcast Stations

RM - 9246

COMMENTS OF

Minnesota Public Radio  
45 East Seventh Street  
Saint Paul, Minnesota 55101

April 24, 1998

Minnesota Public Radio (MPR) is the nation's leading public radio system with 30 full power stations and 18 translators providing two networks of programming to Minnesota and surrounding regions. MPR serves the entire state with a dual stream of noncommercial broadcasting of classical music and round the clock public news programming. In addition, with national distribution of more than 180 hours of programming weekly, MPR is the largest station-based producer of national programming in the country.

MPR strongly believes that while availability of the airwaves should not be limited only to those with deep pockets, whatever proposals are adopted by the Commission need to assure that good engineering practices are maintained to protect the integrity of existing licensees. For example, any proposal that would weaken or interfere with the Channel 6 protection rules of 47 CFR 73.525, the minimum spacing requirements of the 47 CFR 73.507, the prohibited overlap rules of 47 CFR 73.509, or the translator spacing requirements of 47 CFR 74.1204, would cause disruption and harm to the integrity of the signal of existing licensees. Creating a new class of service that would undermine the integrity of existing classes of services should not be a goal of the Commission.

MPR is experienced in and takes seriously its responsibility to understand and to solve interference problems in many areas of the RF spectrum. In our 32 years of existence, we have successfully dealt with interference problems in the AM, FM, and TV bands, as well as in the microwave and satellite bands. The MPR engineering shop is fully equipped to

make measurements in all of the above bands. In contrast, the petitioners in RM 9208 claim that "(M)any of the technicians in microstation broadcasting will be radio amateurs and other experimenters who will be eager to apply their inventive skills to broadcasting."

MPR is committed to creating and maintaining the cleanest possible RF sites. To that end, we have corrected television interference caused by our transmitter and have installed cavity filters in both our own and other station's high power transmitter plants to prevent intermodulation problems.

MPR is also committed to using type-accepted equipment in its facilities, and to following all of the rules of good engineering practice. It is a practice we believe all responsible broadcasters should follow.

It is our belief that following industry accepted practices and maintaining a clean RF operation, besides being a legal requirement and a good engineering practice, also benefits all broadcasters by creating longer transmitter life, and good relations between broadcasters. And a broadcasting framework that protects the integrity of existing station signals and spectrum is a substantial benefit to the American public.

With an already overextended workload, we are concerned that by authorizing the new proposed class of low power license, the Commission will encounter a fair degree of difficulty in insuring broadcasting excellence and fairness to existing licensees. It is therefore belief that if the Commission decides to adopt a Notice of Proposed Rulemaking in response to any or all of the above petitions, the Commission should carefully craft rules that would require low power broadcasters to maintain all of the spacing, good engineering standards and practices required of all other AM and FM licensees, along with an appropriate strict enforcement mechanisms to ensure that the rules are maintained.

Respectfully Submitted,

A handwritten signature in cursive script, reading "Mitzi T Gramling".

Mitzi T Gramling  
Associate General Counsel